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**Hearing Date:** October 18, 2023  
**Objections Date:** August 24, 2023  
**Reply Date:** September 25, 2023

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known  
as NATWEST MARKETS N.V.),

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Lead Adv. Pro. No. 10-05354 (CGM)

**NOTICE OF MOTION TO DISMISS DEFENDANT'S COUNTERCLAIMS  
PURSUANT TO FED. R. CIV. P. 12(B)(6) AND FED. R. BANK. P. 7012(B)**

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 12(b)(6), made applicable to this proceeding pursuant to Federal Rule of Bankruptcy Procedure 7012(b), and upon the accompanying Memorandum of Law (the “Motion”), Plaintiff, Irving H. Picard, Trustee, through his undersigned counsel, will move this Court on October 18, 2023 at 10:00 a.m., before the Honorable Cecelia G. Morris, for an Order pursuant to Federal Rule of Civil Procedure 12(b) dismissing the Counterclaims of defendant ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Stipulation and Order entered on May 31, 2023 (ECF No. 270), written opposition to the Motion or amendment of the Counterclaims must be served and filed no later than August 24, 2023, and any reply in further support of the Trustee’s Motion must be served and filed no later than September 25, 2023.

Dated: July 17, 2023  
New York, New York

/s/ Patrick T. Campbell

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